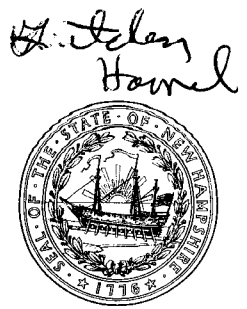




The State of New Hampshire
Department of Environmental Services

Michael P. Nolin
Commissioner



LETTER OF DEFICIENCY
WD WWEB/C 06-007

May 2, 2006

David Allen, P.E.
Deputy Director of Public Works
City of Portsmouth
680 Peverly Hill Rd.
Portsmouth, NH 03801

Subject: National Pollutant Discharge Elimination System (NPDES)
Compliance Sampling Inspection (CSI)
Pease Development Authority Wastewater Treatment Facility (WWTF)
NPDES Permit # NH0090000

Dear Mr. Allen:

On March 23, 2006, as a representative of the Department of Environmental Services, Water Division, Wastewater Engineering Bureau (DES), Stephanie Larson conducted a NPDES CSI at the Pease WWTF. Objectives of a CSI include determining compliance with NPDES permit conditions, verifying accuracy of permit required information and adequacy of permittee sampling and monitoring.

The following people were present during this CSI:

Paula Anania, Chief Plant Operator, Pease WWTF
Daniel Peterson, Plant Operator, Pease WWTF
Stephanie Larson, DES Environmental Inspector

Included are copies of EPA's Water Compliance Inspection Report Form 3560-3 and the sample results for the compliance sampling event. The laboratory results for Fecal coliform, Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS) were within the allowable permit discharge limitations.

During the inspection Stephanie noted the following deficiencies:

Deficiencies (Response Required):

- 1) Whole Effluent Toxicity (WET)
 - a) The NPDES Discharge Monitoring Report (DMR) instructions require all WET test reports to be certified by the permittee. Personnel did not submit a certification form

with their April 2005 WET test report. A copy of the certification form has been submitted to DES and EPA.

- b) A Chain-of-Custody (COC) form lists all of the tests a facility wants analyzed. Pease's WET test COC forms do not list the Day 1 effluent and diluent Total Solids, TSS and Ammonia Nitrogen as Nitrogen ($\text{NH}_3\text{-N}$) analyses. Personnel should add these parameters to their COC forms.

Repeat Deficiencies (Noted in February 1, 2005 NPDES inspection – Response Required) If these repeat deficiencies are noted in any subsequent inspection then DES may proceed immediately with formal enforcement action which may include an administrative fine.

2) Pease personnel have not been completing their DMRs correctly per the EPA's instructions:

- a) Personnel incorrectly calculated or filled out DMRs in January, March and July 2005. Corrected and recertified DMRs were submitted to DES and EPA.
- b) Personnel did not record the Minimum Level (ML) or detection limits on their DMRs or in a cover letter as required by your NPDES DMR instructions. Personnel have begun reporting this information on their DMRs.
- c) All analytical results less than the detection limit or ML must be reported as zero '0' on your DMRs. For example, the ML for Total Residual Chlorine (TRC) is 0.05 mg/l. All results < 0.05 mg/l should be reported as zero. The June and July 2005 TRC monthly average results were both 0.01 mg/l. Personnel reported 0.01 mg/l on the DMRs and not zero '0' as required. Personnel have begun reporting zero '0' on their DMRs.

When signing DMRs, personnel certify that the information reported is true, accurate and complete. Personnel should cross-check their calculations to prevent mistakes and misreporting which are violations of your permit.

Corrective Actions Required:

DES requests that Pease describe all steps taken to correct the deficiencies identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. When the response is complete, the **responsible official** for the municipality or the industry must sign the response. If the submitted response is acceptable to DES and the deficiencies are not repeat deficiencies and/or have not resulted in environmental harm, we will close out the inspection and no further action, other than continued compliance, is required by the permittee. If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.


DES requests that you submit your response to this inspection by **June 2, 2006**. If DES does not receive a complete response signed by the appropriate official within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Stephanie Larson
NHDES-WWEB
P.O. Box 95
Concord, NH 03302-0095

If you have any questions, please call Stephanie at 603-271-1493.

Sincerely,


John R. Bush, P.E.
Administrator
Wastewater Engineering Bureau

Enclosures: EPA Water Compliance Report Form 3560-3
CSI sampling results

cc: DES, WD, WWEB/File
Stephanie Larson, Environmental Inspector, WWEB
Margaret Bastien, P.E., WWEB
Gretchen Hamel, Enforcement Coordinator, DES
Joy Hilton, USEPA Water Technical Unit

CERTIFIED MAIL/RRR: 7099 3400 0018 1294 3783